

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

**WANDA OVALLES, INDIVIDUALLY
AND P.P.A. ADRIAN OVALLES AND
WILSON OVALLES,
Plaintiffs**

v.

C.A. No.: 14-137M

**SONY ELECTRONICS, INC.,
BEST BUY CO., INC., FOXCONN
INTERNATIONAL INC., AND
JOHN DOE CORPORATIONS 1-4,
Defendants**

**DEFENDANT, SONY ELECTRONICS, INC.'S, OBJECTION TO PLAINTIFFS'
MOTIONS TO STRIKE OBJECTIONS AND COMPEL SUPPLEMENTAL
DISCOVERY**

Defendant, Sony Electronics, Inc., hereby objects to Plaintiff, Wilson Ovalles', Motion to Strike Objections and Compel Supplemental Answers to Interrogatories (Document #39), Plaintiff, Wanda Ovalles' Motion to Strike Objections and Compel Supplemental Answers to Interrogatories (Document #41), and Plaintiff, Wanda Ovalles', Motion to Strike Objections and Compel Supplemental Production of Documents (Document #43).

As grounds for its Objection, defendant relies upon the attached Memorandum of Law and accompanying exhibits.

Defendants,

Sony Electronics, Inc.
By their attorneys,

/s/ John F. Kelleher

Gerald C. DeMaria, Esq. (#0637)
John F. Kelleher, Esq. (#3854)
HIGGINS, CAVANAGH & COONEY, LLP
123 Dyer Street
Providence, RI 02903-3987
401-272-3500

Robert J. Hafner, Esquire
Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place, 22nd Floor
50 S. 16th Street
Philadelphia, PA 19102
Pro Hac Vice Counsel for Sony Electronics

CERTIFICATE OF SERVICE

I, John F. Kelleher, certify that on the 23rd day of November, 2015, a true copy of the within was filed electronically and it is available for viewing and downloading from the ECF system. Counsel of record received notice of the filing of this document electronically from the United States District Court for the District of Rhode Island.

/s/ John F. Kelleher